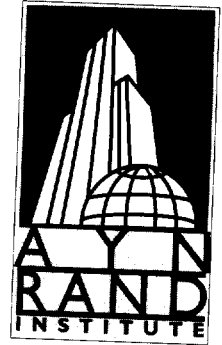


U.S. DEPT. OF LABOR
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January 8, 2002

Secretary of Labor
Top-Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

Re: The Ayn Rand Institute 457B Plan

Dear Secretary:

Pursuant to Section 2520.104-23 of the Department of Labor's Regulations, this letter will serve as notice that, with respect to The Ayn Rand Institute 457B Plan (the "Plan"), the undersigned intends to utilize the alternative form of compliance with the reporting and disclosure requirements of Part 1 of Title 1 of the Employee Retirement Income Security Act of 1974 ("ERISA"), which alternative form of compliance is provided in the aforesaid Regulations Section.

Pursuant to Regulations Section 2520.104-23(b), the following information is provided:

1. Name and Address of Employer: The Ayn Rand Institute, 4640 Admiralty Way, Suite #406, Marina del Rey, California, 90292
2. Employer's Taxpayer Identification Number: 22-2570926
3. The Employer hereby declares that it maintains the Plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, and that there are four employees in such plan at this time.

Pursuant to Regulations Section 2520.104-23(b)(2), the Employer will provide Plan documents, if any, to the Secretary of Labor upon request as required by Section 104(a)(1) of ERISA.

Very truly yours,

Julie Repass
Treasurer

Cc: Dave Mohammed, VALIC

4640 Admiralty Way
Suite 406
Marina del Rey
CA 90292-6617

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Secretary of Labor
TopHat Plan Exemption, Pension + Welfare Benefits Admin.
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200 Constitution Ave, NW, Room N-5644
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